UNITED	SI	'AT	ES	DIST	rric	CT CC	DURT
SOUTHER	RΝ	DI	STF	RICT	OF	NEW	YORK

-----x

CHANIE FRIEDMAN, on behalf of herself individually and all others similarly situated,

ANSWER

Plaintiff,

08 CV 0971 (Karas, J.)

-against-

AFNI, INC.,

Defendant(s).

Defendant, AFNI, INC., by its attorney MEL S. HARRIS AND ASSOCIATES, LLC, answers plaintiff's complaint as follows:

- 1. The defendant denies knowledge or information sufficient to form a belief as to each and every allegation contained in paragraph "1" of the complaint.
- 2. Defendant admits the allegations contained in paragraph "2" of the complaint.
- 3. Defendant admits the allegations contained in paragraph $^{"3"}$ of the complaint.
- 4. Defendant denies knowledge or information sufficient to form a belief as to each and every allegations contained in paragraph "4" of the complaint.

- 5. Defendant admits the allegations contained in paragraph "5" of the complaint.
- 6. Defendant denies each and every allegation contained in paragraph "6" of the complaint.
- 7. Defendant denies each and every allegation contained in paragraph "7" of the complaint.
- 8. Defendant denies each and every allegation contained in paragraph "8" of the complaint.
- 9. Defendant denies each and every allegation contained in paragraph "9" of the complaint.
- 10. Defendant denies each and every allegation contained in paragraph "10" of the complaint.
- 11. Defendant denies each and every allegation contained in paragraph "11" of the complaint.
- 12. Defendant denies each and every allegation contained in paragraph "12" of the complaint.
- 13. Defendant denies each and every allegation contained in paragraph "13" of the complaint.
- 14. The defendant denies each and every allegation contained in paragraph "14" of the complaint.
- 15. The defendant admits sending correspondence to the plaintiff, but otherwise denies knowledge or information sufficient

to form a belief as to each and every allegation contained in paragraph "15" of the complaint.

- 16. The defendant admits sending correspondence to the plaintiff, but denies knowledge or information sufficient to for a belief as to each and every allegation contained in paragraph "16" of the complaint.
- 17. The defendant admits receiving correspondence from plaintiff, but otherwise denies knowledge or information sufficient to form a belief as to the allegations allegation contained in paragraph "17" of the complaint.
- 18. The defendant admits the allegations contained in paragraph "18" of the complaint.
- 19. The defendant denies each and every allegation contained in paragraph "19" of the complaint.
- 20. The defendant denies each and every allegation contained in paragraph "20" of the complaint.
- 21. The defendant denies each and every allegation contained in paragraph "21" of the complaint.
- 22. The defendant denies each and every allegation contained in paragraph "22" of the complaint.
- 23. The defendant denies each and every allegation contained in paragraph "23" of the complaint.

24. the defendant denies each and every allegation contained in paragraph "24" of the complaint.

of procedures reasonably adapted to avoid any such error.

WHEREFORE, the defendant respectfully requests that plaintiff's complaint be dismissed.

Dated: New York, NY February 21, 2008

Arthur Sanders (AS-1210)
MEL S. HARRIS AND ASSOCIATES, LLC
Attorneys for defendant
5 Hanover Square - 8th Floor
New York, NY 10004
212-660-1050

TO:

KLEINMAN, LLC Abraham Kleinman (AK-6300) 626 Rex Corp Plaza Uniondale, NY 11556-0626